

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

G & G Closed Circuit Events LLC,

Plaintiff,

vs.

**Ashleigh Bertolini, individually, and GLO
718 Corp. d/b/a PARQ,**

Defendants.

Index No. 21-cv-07351

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Local Civil Rule 56.1 Statement, dated December 2, 2022, the Declaration of Emmanuel Colon, December 2, 2022, the Declaration of Rob Rickner, dated December 2, 2022, and the exhibits annexed thereto; the accompanying Memorandum of Law in Support of Defendants' Motion for Summary Judgment, dated December 2, 2022; and upon all prior pleadings and proceedings had herein, defendants Ashleigh Bertolini, individually, and GLO 718 Corp. d/b/a PARQ, will move this Court before Judge Denise L. Cote, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007-1312, on a return date to be set by the Court, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that no genuine issue of material fact exists to warrant a trial, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
 December 2, 2022

Respectfully submitted,

/s/ Shana Fried

Shana Fried
The Fried Firm PLLC
231 Front Street, Suite 216
Brooklyn, New York 11201
shana@thefriedfirm.com
Fax: 718.228.7603
Tel: 718.422.0500

/s/ Rob Rickner _____

Rob Rickner
Rickner PLLC
14 Wall Street, Suite 1603
New York, New York 10005
rob@ricknerpllc.com
Fax: 888-390-5401
Tel: 212-300-6506